

EXHIBIT 9

REVISED REDACTIONS

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Attorneys for Plaintiff
 NEELAM SANDHU

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

NEELAM SANDHU, an individual,
 Plaintiff,

vs.

BLACKBERRY CORPORATION; a
 Delaware Corporation; and
 JOHN GIAMATTEO; an individual,
 Defendants.

Case No.: 3:24-cv-02002

**PLAINTIFF'S SECOND AMENDED
 RESPONSES TO DEFENDANT
 BLACKBERRY
 CORPORATION'S INTERROGATORIES,
 SET ONE**

Judge: Hon. Sallie Kim

Plaintiff hereby responds to BlackBerry's first set of interrogatories. Plaintiff objects to the definitions and instructions to the extent they require Plaintiff to do anything beyond what is required by the Federal Rules of Civil Procedure, the Local Rules of this Court, or an order of this Court.

INTERROGATORY 1

DESCRIBE in detail EACH protected activity in which YOU engaged that YOU contend caused DEFENDANTS to retaliate against YOU.

RESPONSE TO INTERROGATORY 1

Plaintiff objects to this interrogatory as premature because Defendants' document production is incomplete. Subject to and without waiving this objection, Plaintiff responds:

Plaintiff told John Chen that Giamatteo had attempted to seduce her at what should have been an ordinary business dinner. She also asked Chen that she not be required to travel alone with Giamatteo (which Chen agreed to.)

Plaintiff reported to HR that Giamatteo was undermining her and trying to force her out of the company. (BB13-00004373.)

Plaintiff complained that she had been undermined when an organizational chart showing her as a subordinate of Giamatteo was sent to a customer. (BB13-00002482.)

On November 6, 2023, Plaintiff spoke with Ms. Hill and Mr. Tate from Morrison & Foerster, who informed her they were investigating Giamatteo's behavior towards women. The attorneys assured Plaintiff no retaliation would occur. Based on this assurance, she shared with them her experience with Giamatteo and how he discriminated against her and retaliated against her after she rejected him. Plaintiff also had written communications with them, for example at DOE000143-144:

From: Neelam Sandhu
Sent: Thursday, November 16, 2023 7:45 AM
To: Hill, Christin Joy <CHill@mofo.com>
Cc: BlackBerry ELInv <BlackBerry_ELInv@mofo.com>; Nita White-Ivy (nwhiteivy@blackberry.com) <nwhiteivy@blackberry.com>; Neelam Sandhu <nsandhu@blackberry.com>
Subject: RE: Follow Up RE: Confidential Meeting

Christin,

Unfortunately, I am sharing another example of John Giamatteo's retaliation against me as it continues today with him still cutting me out of my job.

As BlackBerry's CMO, I am responsible for Press Releases. My team intakes PR requests, writes PR's, is the point of contact with external parties (e.g. customers) if it is a joint PR, I review/edit/approve and then review with CEO for final approval. There are also other tasks my team and I undertake. This accountability is noted in the company MAP and has been for several years.

I reached out to John Giamatteo and his team yesterday to suggest preparing a PR for a Cyber deal (attachment "PR"). He then sent an email (attachment "Malaysia Deal Communications") with the PR already written and approved. I was not involved in or aware of this process at all and nor were my team.

1

DOE000143

This is a very distressing situation.

Nita,
I have copied you on this email to note this new incident with BlackBerry HR also.

Neelam

See also DOE000144:

From: Neelam Sandhu <nsandhu@blackberry.com>
Sent: Tuesday, November 7, 2023 5:04 PM
To: Hill, Christin Joy <CHill@mofo.com>
Cc: BlackBerry Elnv <BlackBerry_Elnv@mofo.com>; Neelam Sandhu <nsandhu@blackberry.com>
Subject: Follow Up RE: Confidential Meeting

As requested on our call yesterday, attached are some documents that demonstrate JJG's harassment of me, which commenced after I did not respond positively to his suggestive comments.

- Attachment "JJG" has information I had previously sent to HR.
- Two attachments "15 minutes with JJG" that show that I have been trying to meet with him since September on SEM, which he knows from Kevin Easterwood on his team is for cost savings I am trying to drive for the company, but he has been pushing the meeting off. He pushed the meeting off until end of September originally, then to November 3 (at the same time I had heard that he had told people in the company that 'if John Chen and Neelam aren't gone from the company by November 3rd I [JJG] am resigning.' Yesterday his EA asked to move the meeting to November 8, which we did, and today he has completely declined the meeting (attachment "Declined: John Giamatteo I Neelam").
- Attachment "BB Cyber Security Weekly Leadership team Call" where he asked me and three others to join his weekly team call. I agreed to join as often as I could however I did not receive the invite for several months. The other three people on the email received the invite right away. JJG then proceeded to tell others, including John Chen, that I was not attending the meetings and so am not collaborative – commentary which was negatively impacting my reputation in the company. I asked for the invite several times (e.g. attachment "Cylance Product Issues") before receiving it several months later.
- This was a pattern for JJG – telling me he would invite me to meetings but then not sending me the invite, while sending it to all others. He would then tell people I refused to attend and am not collaborative. He put me in the uncomfortable position of having to prove I was 'nice' and 'collaborative' and to do so with someone who was harassing me. Second attachment "Cylance Product Issues" is another such meeting.
- Attachment "Analyst Day" shows him taking credit for an Elite Customer deal I had closed, which the customer had not at the time given me approval to allude to publicly or mention publicly at the time. JJG mentioned it publicly at Analyst Day as though it were one of his deals and when I asked him he denied mentioning it and then did not reply to my follow up email with a link to the recorded proof.

These are just some examples.

Neelam

Plaintiff relayed her complaints about Giamatteo to Dick Lynch, as shown in the e-mail below (produced at DOE000143):

From: Neelam Sandhu
Sent: Thursday, November 16, 2023 8:08 AM
To: Dick Lynch <dick.lynch@blackberry.com>
Subject: FW: Follow Up RE: Confidential Meeting

Dick,

From our interactions to date I believe that company culture, transparency, and teamwork are important to you, to ultimately drive company results.

With that, I would like to make you aware of this recent example where that has not happened (and has not been happening for a long time), and request your help with addressing it. I would appreciate your support.

Thank you,
Neelam

Cooperating in the investigation described in DOE000186-192 (concerning [REDACTED]
[REDACTED] was protected conduct that contributed to her perception of being a
“troublemaker.”

INTERROGATORY 2

DESCRIBE in detail EACH act of retaliation that YOU contend was taken against YOU
by DEFENDANTS.

RESPONSE TO INTERROGATORY 2

Plaintiff’s termination, which occurred around December 4, 2023.

For additional examples of retaliation, see the e-mail below, which was produced at
BB13-00004373:

- As you know, in July 2022 I became aware that the Cyber BU had published an org chart (*attachment "EMEA Customer Slide"*) to Elite customer(s) that incorrectly showed me reporting to JJG. Unfortunately, JJG hesitated in taking action to address this issue, despite multiple follow-ups with him.
- JJG's team, on an ongoing basis, does not appropriately acknowledge my role. For example:
 - The MAP was updated in January 2022 to state, for example, that all Elite customer proposals should be sent to me before being sent to a customer or partner. This is not happening, except in rare instances and even those rare instances it has taken extensive dialogue with the BU. I have followed up with members of the BU countless times (*attachment "SSC" is an example*) but I am either ignored or given the runaround.
 - In November 2021 communication responsibilities were published for Elite government customers (*attachment "Government Communications Responsibility Overview"*). I have spoken about this with the Cyber BU but some of the team do not align with the published requirements.
 - One of my Elite customers is Bank of America. My team and I have put in a lot of work to retain this customer and we are the customers point of contact. Today I learned that JJG's team has put together a document (*attachment "BoFA-BlackBerry Team Alignment"*), which they intend to share with the customer, that removes my team and I entirely per the RACI table on page 2 of the document. Per MAP I am responsible for Elite customer strategy, yet on page 2 of the document in the RACI table I am nowhere to be found and nor is my team. My team and I are also the customers point of contact interacting with them almost every day and this has been the case for 2+ years. Sharing this document with the customer will confuse the customer and be detrimental to my job, effectively eliminating it. The relationship with the customer is operating smoothly and has been for 2 years. Why are changes now being pushed?
- The aforementioned behaviors may stem from the fact that JJG has told his team that my role will be changing on March 1. I am unclear on why he has told his team this and I find it very distressing. Some examples:
 - On January 12, 2023, Tab Holder informed me that last year Craig Hansen had told him not to work with me. He also mentioned that Craig had told him that he (Craig) had asked JJG to remove me from working with some of the Elite customers e.g. DoD. And JJG responded that he is working on it / working on removing me.
 - On February 1, 2023, Lorenzo Monaco informed me that Georges Piccini mentioned to him that Michael Murphy had told him that JJG told him (Michael) that Neelam's role will change on March 1, and she won't be responsible for Elite anymore.

For additional examples of retaliation, see the e-mail below, which was produced at

BB13-00000865:

From: Neelam Sandhu [nsandhu@blackberry.com]
Sent: 3/30/2022 4:45:44 PM
To: John Chen [john.chen@blackberry.com]
Subject: FW: Internal: [REDACTED] Executive Meeting Briefing Summary & Bridge Fix Strategy

Mark on my team has been talking to [REDACTED] about Bridge, as you know and as mentioned in thread below. Earlier Mark added me to the email thread below. Subsequently Cyber leaders replied but without me on thread.

Then Adam instructs Mark on my team to schedule a call with him, JJG and Billy. Without me on thread again, without asking me, and even though Adam is aware that we are already working on this and have been for a couple of weeks.

Then Mark calls me and says "why do they always deliberately exclude you?"

This is okay?
 How should I respond to my team?

As I said the other day, I don't tell you half the stuff they do as my focus is on doing the right thing for the company and on collaboration. But their behavior is unacceptable and the consequences for some reason have become mine, while their behavior goes unaddressed. So they are effectively given tacit approval to treat me this way.

So, what I see is "do the right thing for the company and work hard = get punished". This is the wrong cultural precedent to set.

Neelam

For additional examples of retaliation, see the e-mail below, which was produced at
DOE000111:

From: Neelam Sandhu <nsandhu@blackberry.com>
Sent: Tuesday, May 23, 2023 8:07 PM
To: Steve Rai <steve.ra@blackberry.com>
Subject: Re: Web Banner for AGM

Steve,

I am not going to engage further in this. I would have hoped your conversations with Tim to date would have addressed the ongoing behavior.

In this case, my team raised a JIRA ticket for the web team to publish the AGM date to 4 pages on BB.com. This is the correct process for any web update, and not the first time we have done it. The web team then takes it from there. I shouldn't be doing it for them and this minutia should not be where I spend my time.

Tim is clearly looking for any angle to tarnish my reputation with my colleagues and he also does not treat me like a C-level. If, for example, Mattias asked his team to execute on something and others, on his team or on other teams, appropriately executed on next steps would Tim email Mattias angrily asking why Mattias didn't let him know but others whose job it is to execute on next steps were the ones to let him know? The answer is no, as Tim understands that minutia isn't Mattias' job. It is perfectly appropriate that I am not the one communicating everything to Tim, but others are delivering the information instead.

Neelam

For additional examples of retaliation, see the e-mail below, which was produced at
DOE000134-135:

From: Neelam Sandhu <nsandhu@blackberry.com>
Date: Tuesday, Nov 07, 2023 at 5:05 PM
To: Hill, Christin Joy <CHill@mofo.com>
Cc: BlackBerry ELInv <BlackBerry_ELInv@mofo.com>, Neelam Sandhu <nsandhu@blackberry.com>
Subject: Follow Up RE: Confidential Meeting

External Email

As requested on our call yesterday, attached are some documents that demonstrate JJG's harassment of me, which commenced after I did not respond positively to his suggestive comments.

- Attachment "JJG" has information I had previously sent to HR.
- Two attachments "15 minutes with JJG" that show that I have been trying to meet with him since September on SEM, which he knows from Kevin Easterwood on his team is for cost savings I am trying to drive for the company, but he has been pushing the meeting off. He pushed the meeting off until end of September originally, then to November 3 (at the same time I had heard that he had told people in the company that 'if John Chen and Neelam aren't gone from the company by November 3rd I [JJG] am resigning.' Yesterday his EA asked to move the meeting to November 8, which we did, and today he has completely declined the meeting (attachment "Declined: John Giamatteo I Neelam").

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DOE000134

- Attachment "BB Cyber Security Weekly Leadership team Call" where he asked me and three others to join his weekly team call. I agreed to join as often as I could however I did not receive the invite for several months. The other three people on the email received the invite right away. JJG then proceeded to tell others, including John Chen, that I was not attending the meetings and so am not collaborative – commentary which was negatively impacting my reputation in the company. I asked for the invite several times (e.g. attachment "Cylance Product Issues") before receiving it several months later.
- This was a pattern for JJG – telling me he would invite me to meetings but then not sending me the invite, while sending it to all others. He would then tell people I refused to attend and am not collaborative. He put me in the uncomfortable position of having to prove I was 'nice' and 'collaborative' and to do so with someone who was harassing me. Second attachment "Cylance Product Issues" is another such meeting.
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These are just some examples.

Neelam

For additional examples of retaliation, see the e-mail below, which was produced at
DOE000143-144:

From: Neelam Sandhu
Sent: Thursday, November 16, 2023 7:45 AM
To: Hill, Christin Joy <CHill@mofo.com>
Cc: BlackBerry EInv <BlackBerry_EInv@mofo.com>; Nita White-ivy (nwhiteivy@blackberry.com) <nwhiteivy@blackberry.com>; Neelam Sandhu <nsandhu@blackberry.com>
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Christin,

Unfortunately, I am sharing another example of John Giamatteo's retaliation against me as it continues today with him still cutting me out of my job.

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I reached out to John Giamatteo and his team yesterday to suggest preparing a PR for a Cyber deal (attachment "PR"). He then sent an email (attachment "Malaysia Deal Communications") with the PR already written and approved. I was not involved in or aware of this process at all and nor were my team.

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DOE000143

This is a very distressing situation.

Nita,
I have copied you on this email to note this new incident with BlackBerry HR also.

Neelam

The demeaning and harmful conduct described in the investigation report produced at
DOE000186-192.

FIRST AMENDED RESPONSE TO INTERROGATORY 2

Plaintiff adds the following.

Around December 2022, Giamatteo told Plaintiff that "it is important that you be nice to me, as I know a lot of people in the industry/have a large network so it could impact you negatively if you are not nice to me," or words to that effect.

1 Plaintiff was informed that Giamatteo told a partner of the Company ([REDACTED]
2 [REDACTED]), at a golf event that the Company hosted at Pebble Beach, that Plaintiff is annoying and
3 made other negative comments about her.

4 Giamatteo told others within the company that Plaintiff was uncollaborative and difficult
5 to work with. He also said that she failed to attend meetings he had invited her to (even though
6 Giamatteo had not actually invited her to those meetings).

7 Around February of 2023, Giamatteo told members of his team that Plaintiff would no
8 longer be in charge of Elite customers from March 1, 2023. This rumor, which was not true,
9 spread to Plaintiff's team, who became concerned for their jobs (as did Plaintiff). When Plaintiff
10 asked John Giamatteo about it, on a call on February 7, 2023, he admitted that he had told some
11 of his team that (all the names he mentioned were white males) as they wanted the Elite
12 customers to be theirs (as Plaintiff was performing well with the Elite customers from a sales
13 perspective and their sales were poor) and he had wanted to make them feel good.

14 On countless occasions, Plaintiff heard from across the Company that John Giamatteo had
15 told people internally that he wanted Plaintiff out of the Company. Plaintiff was even told that he
16 said he would leave if Plaintiff were not gone in November of 2023.

17 According to John Chen, on multiple occasions, Giamatteo asked Chen to move the Elite
18 Customers function to under Giamatteo.

19 When Plaintiff wanted her title to be Chief Elite Customer Officer, Giamatteo objected to
20 John Chen about the job title because he did not want the "Success" removed from her job title.

21 Plaintiff was not given a salary increase when she took on the CMO role. John Chen told
22 her that Giamatteo was already upset that she had been given the CMO role, and that Giamatteo
23 would create problems if Plaintiff were already given a salary increase.

24 Giamatteo roadblocked Plaintiff from being named an officer, which limited her
25 compensation.

26 Tim Foote also retaliated against Plaintiff by, among other things:

- 27 • Foote would block Plaintiff from getting credit for her work, e.g., her sales contributions
28 to the Company's billings numbers. He would not let her speak at Company events

(Analyst Day, Investor Events) or acknowledge her to investors, but he would for John Giamatteo and Mattias Erickson (the two other executives in the Company with a sales responsibility). They would then get public credit for her sales.

- He would manipulate Plaintiff, telling her that she should leave, as no one likes her and people like Phil Kurtz ‘bitch about her to [him] everyday’. He would then call Plaintiff to follow up to ask if she had applied for jobs. When Plaintiff told him “no,” he would get angry and put the phone down.
- He would lie about Plaintiff, for example he told John Chen that she had not sent him a particular press release for review when she had. He told many lies like this about Plaintiff to many people to tarnish her reputation. He would also tell people on a regular basis that Plaintiff wasn’t responsive enough to him, for example when Plaintiff traveled to Africa he did not receive an immediate response from Plaintiff to an email and so sent an email a few hours after emailing her to multiple people in the Company saying she was not responsive.
- Plaintiff began to feel emotionally fragile and once cried when it felt too much as he was again telling her how much people (e.g. Phil Kurtz) talk negatively about her. He then hugged her and said, “you should leave the Company.” Plaintiff asked Kurtz, and he denied it. Foote then confronted her and said she shouldn’t have asked Phil, as he had told her in confidence.
- Plaintiff did inform his direct manager (the CFO, Steve Rai) of his behavior. Steve Rai said he would talk to Tim Foote, but nothing about his behavior changed.
- Tim would also exclude Plaintiff from emails that he would include the prior CMO (white male) on and Plaintiff raised this to both CEO (John Chen) and CFO (Steve Rai) asking for their help to resolve it.
- And, in her first 1:1 with Dick Lynch, Dick told Plaintiff that Tim had told him Plaintiff was difficult to work with. Plaintiff told Dick that actually Plaintiff was having a hard time getting information about Investors from Tim and team that would help her do her job as CMO.

Phil Kurtz also retaliated against Plaintiff, for example by excluding her from information/meetings she should have been invited to. And in November 2023, when Plaintiff asked HR to investigate one of her team members for not following policy, she found out from her personnel file that Kurtz had found out about the investigation and stepped into it, though he was not invited to. He made statements about the policy Plaintiff was having her team follow being the wrong policy, though he should have had no say about it, especially as the policy was clear and documented. He stated that Plaintiff was just upset about John Chen leaving, implying that (as a woman) she was too emotional to understand the situation. And Kurtz was put in charge, by the board of directors, of the MoFo investigation, which normally is led by Head of HR (Nita White-Ivy) and Nita was completely cut out of it.

Plaintiff wishes to emphasize that she was retaliated against on a near-daily basis. Accordingly, is not possible to recount a complete list of every instance of retaliation that she experienced.

INTERROGATORY 3

DESCRIBE in detail EACH complaint YOU made to BLACKBERRY related to YOUR employment, BLACKBERRY's corporate culture, or mistreatment or misconduct by any other BLACKBERRY employee—including the date of the complaint, the subject of the complaint, who at BLACKBERRY was aware of the complaint, and details of any investigation or other action taken by BLACKBERRY in response to the complaint.

RESPONSE TO INTERROGATORY 3

Plaintiff objects to this interrogatory as overbroad, unduly burdensome, and not proportional to the needs of the case. Plaintiff worked for BlackBerry for over a decade. Accordingly, it is impossible to catalog each complaint relating to her employment, BlackBerry's culture, or misconduct by any other employee. Additionally, much of the responsive information would likely have no relevance to the case.

FIRST AMENDED RESPONSE TO INTERROGATORY 3

Without waiving her objections, Plaintiff adds the following. Plaintiff told John Chen that Giamatteo had attempted to seduce her at what should have been an ordinary business dinner.

1 She also asked Chen that she not be required to travel alone with Giamatteo (which Chen agreed
2 to.) Chen also followed up with Plaintiff later the same day to say he was very
3 disturbed/concerned by Giamatteo's behavior and words and found it to be weird.

4 Plaintiff reported to HR that Giamatteo was undermining her and trying to force her out of
5 the company. (BB13-00004373.)

6 Plaintiff complained that she had been undermined when an organizational chart showing
7 her as a subordinate of Giamatteo was sent to a customer. (BB13-00002482.) Also, when HR
8 circled back with Plaintiff after they had investigated the issue, Plaintiff emailed back (to Jennifer
9 Bramhill) with: "I don't agree with the finding however am satisfied at this time with the outcome
10 that the sales team has been informed to ensure this does not happen again. Also, can the sales
11 team advise if they sent or mentioned the same to any other customers? If so can they send a
12 corrective communication?" Plaintiff did not receive any response from HR to her questions.

13 On November 6, 2023, Plaintiff spoke with Ms. Hill and Mr. Tate from Morrison &
14 Foerster, who informed her they were investigating Giamatteo's behavior towards women.
15 The attorneys assured Plaintiff no retaliation would occur. Based on this assurance, she shared
16 with them her experience with Giamatteo and how he discriminated against her and retaliated
17 against her after she rejected him. Plaintiff also had written communications with them, for
18 example at DOE000143-144:

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With that, I would like to make you aware of this recent example where that has not happened (and has not been happening for a long time), and request your help with addressing it. I would appreciate your support.

Thank you,
Neelam

Cooperating in the investigation described in DOE000186-192 [REDACTED]

[REDACTED] was protected conduct that contributed to her perception of being a “troublemaker.”

INTERROGATORY 4

IDENTIFY EACH PERSON referred to in YOUR allegation that “PLAINTIFF has since learned of other women who have experienced similar gender discrimination issues with GIAMATTEO and were retaliated against after raising concerns about GIAMATTEO’s conduct.”

RESPONSE TO INTERROGATORY 4

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

INTERROGATORY 5

For EACH PERSON identified in YOUR response to Interrogatory 4, above, state ALL facts of which YOU are aware related to the instances of “similar gender discrimination issues” and/or retaliation referenced in YOUR COMPLAINT.

RESPONSE TO INTERROGATORY 5

Plaintiff objects to this request because it calls for her to describe events for which she does not have first-hand knowledge. Should Defendants desire to know what a non-party observed and experienced, Defendants should take the deposition of that non-party.

FIRST AMENDED RESPONSE TO INTERROGATORY 5

Plaintiff will provide what she has heard from the following women. In providing this response, Plaintiff is not purporting to have witnessed first-hand the following events:

██████████ told Plaintiff that she had worked for Giamatteo ██████████ and that Plaintiff should avoid working for him. ██████████ also said that if Plaintiff did end up working for him, that she should have a regular 1:1 meeting with the CEO that did not include Giamatteo and that ideally he was not aware of, as she did at ██████████

██████████ told Plaintiff she found Giamatteo to be “creepy,” as he had put his arm around her waist and pulled her uncomfortably close to take a selfie with her at a BlackBerry event. She also mentioned that he and his male leadership team were difficult to work with and uncooperative, which affected the performance of the business partnership negatively, ultimately hurting BlackBerry.

Plaintiff has been told by multiple sources that ██████████ was harassed by John Giamatteo. Plaintiff has also been told that another female in his organization, ██████████, ██████████, left the Company in protest of how ██████████ was treated, as well as at her own treatment as a woman. During a January 11, 2024 call, ██████████ said that with the male team John Giamatteo brought with him into BlackBerry from his prior jobs, the “vibe was very boys club.” She said “all those guys are weird.” She mentioned an example where she had to virtually record one of them (Hans-Peter Vestberg) for an internal sales training and he had a painting of a half-naked

woman behind him that she reported to Mary Slimmon in HR after the call and had to edit out of the video before publishing it.

[REDACTED], Executive Assistant to John Chen, had mentioned to Plaintiff that she would not like to be left alone in a room with Giamatteo as he made her feel uncomfortable.

Plaintiff had a call with [REDACTED] on January 12, 2024. John Giamatteo terminated her on the basis of her role being made redundant but the role has since been rehired for, filled with a white male. [REDACTED] said that she thought that John Giamatteo was not supportive of women and created a boys club culture (making comments of a sexual/sexist nature, together with other men he had brought into the Company – HP, JD) and only hired men. She said that when she stood up for herself John Giamatteo reduced her role, while increasing the scope of men’s role even if the men were underperforming.

[REDACTED]. She told Plaintiff the environment was very toxic and called Giamatteo, Don and others (e.g. Mike Kopf), male chauvinist pigs that need to be held accountable. All three of these men are ex-McAfee (i.e. part of the boys club). She told Plaintiff that Don Giorgio made sexist comments to her. One example of a comment he made to her is “do you need big daddy Don to help you close the deal” and she has a screenshot of this as he made the comment in writing in Microsoft Teams. (Note that Don was also difficult with Plaintiff, e.g. he met her customers behind her back. He said he was pressured by Giamatteo to meet them.) Mike Kopf told [REDACTED] he doesn’t ever have to worry about his job because of his friendship with Giamatteo and Don. She told Plaintiff that she went to HR and then shortly after was made redundant.

[REDACTED] was a direct report of Mattias. His only female direct report. He treated her very poorly, despite her seniority, skills and tenure with the company (20+ years). Mattias had wanted to exit her but John Chen told him he could not. She was then demoted to report to a direct report of Mattias’ (Vito Giallorenzo) instead of reporting to Mattias directly. She was told this was to protect her employment. Mattias treated her poorly and allowed other men in the company to do the same - undermining her, not listening to her despite her role, etc. She went on

1 [REDACTED] She was meant to return in November after 6 months of leave but was told that a)
2 John Chen was retiring and b) her role was no longer available for her to return to and she could
3 try to find another role in the company. She could not find another role so was made redundant
4 instead. Plaintiff's call with [REDACTED] was on 01/25/2024.

5 **INTERROGATORY 6**

6 IDENTIFY the dates of (i) your first contact with any attorney affiliated with Gomeran
7 Bourn & Associates; and (ii) your first contact with other lawyers or law firms RELATING TO
8 your employment at BLACKBERRY, your experiences with GIAMATTEO, or the allegations
9 asserted in YOUR COMPLAINT.

10 **RESPONSE TO INTERROGATORY 6**

11 Plaintiff objects to this interrogatory because it calls for information not relevant to the
12 case. When Plaintiff first contacted her attorneys has no impact on the merits of the case.

13 **JULY 16, 2025 AMENDED RESPONSE TO INTERROGATORY 6**

14 Without waiving the previous objections, Plaintiff responds that that she first contacted
15 the Gomeran Bourn law firm on November 17, 2023. She did not contact another law firms,
16 although she did briefly discuss her employment with Rich Curiale a day or two before contacting
17 the Gomeran Bourn law firm.

18 **INTERROGATORY 7**

19 DESCRIBE in detail YOUR involvement in the submission of the October 2023
20 EthicsLink complaint and follow-up message dated October 28, 2023 (both attached as Exhibit
21 A) regarding alleged harassment by GIAMATTEO, including whether YOU wrote or provided
22 input into some or all of the complaint or follow-up message dated October 28, 2023.

23 **RESPONSE TO INTERROGATORY 7**

24 Plaintiff did not submit the complaint and will not speculate about the manner in which it
25 was prepared.

FIRST AMENDED RESPONSE TO INTERROGATORY 7

Plaintiff did not prepare this complaint or assist in the preparation of this complaint. Neither did she submit the complaint. In short, she was not involved in the creation of this complaint.

INTERROGATORY 8

IDENTIFY every person referred to in the following statements made in connection with the October 2023 EthicsLink complaint: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RESPONSE TO INTERROGATORY 8

Plaintiff will not speculate about the identity of that group of women.

FIRST AMENDED RESPONSE TO INTERROGATORY 8

Plaintiff did not prepare this complaint or assist in the preparation of this complaint. Neither did she submit the complaint. In short, she was not involved in the creation of this complaint.

INTERROGATORY 9

DESCRIBE in detail all efforts YOU have made to secure employment since YOUR termination, including EACH company and EACH role to which YOU have applied, EACH interview YOU have completed, and EACH job offer YOU have received.

RESPONSE TO INTERROGATORY 9

Plaintiff objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case. Plaintiff is not required to provide evidence of every effort she has made to seek new work (and hence mitigate her damages). Instead, the law requires only that she make “reasonable efforts” to mitigate her damages. *See, e.g.*, CACI 3963.

Subject to and without waiving these objections, Plaintiff responds this interrogatory pursuant to FRCP 33(d) by directing Defendants to the documents produced at DOE000441-461, as well as additional documents being produced concurrently with the service of these responses.

FIRST AMENDED RESPONSE TO INTERROGATORY 9

Plaintiff maintains her objections.

Nevertheless, Plaintiff will provide a list of companies and job she has applied for. She will also search for copies of job applications that she has submitted and interviews she has had. She has not received any offers.

INTERROGATORY 10

DESCRIBE in detail YOUR involvement with the below tweet, posted on November 2, 2023, by @nerdytechgal, including whether YOU wrote the tweet:



RESPONSE TO INTERROGATORY 10

Plaintiff did not post this tweet and will not speculate about who wrote it.

FIRST AMENDED RESPONSE TO INTERROGATORY 10

Plaintiff did not prepare this tweet or assist in the preparation of this tweet. Neither did she post the tweet. In short, she was not involved in the creation of this tweet.

INTERROGATORY 11

DESCRIBE in detail any oral or written communications YOU had or are aware of with PERSONS associated with the *Globe & Mail* regarding the existence of a complaint or complaints RELATING TO GIAMATTEO, sexual harassment, or retaliation.

RESPONSE TO INTERROGATORY 11

Plaintiff objects to this interrogatory because it calls for information not relevant to the case. Plaintiff's communications with the *Globe & Mail* have no impact on the merits of the case.

Dated: July 24, 2025

GOMERMAN | BOURN & ASSOCIATES

By: Anthony Tartaglio
 MARIA BOURN
 Anthony Tartaglio
 Attorneys for Plaintiff
 NEELAM SANDHU

VERIFICATION

I, NEELAM SANDHU, have read the foregoing **PLAINTIFF'S RESPONSES TO DEFENDANT BLACKBERRY CORPORATION'S INTERROGATORIES, SET ONE** and I know the contents thereof. The same is true of my own knowledge, except for those matters stated upon my information and belief and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on 7/24/2025, at

 Dublin, CA, California.

DocuSigned by:

Neelam Sandhu

34C2543D57E942B...

NEELAM SANDHU

Plaintiff

1 **PROOF OF SERVICE**

2 I am a resident of the United States and employed in the County of San Francisco, over
3 the age of eighteen years and not a party to the within action or proceeding. My business address
4 is 825 Van Ness Avenue, Suite 502, San Francisco, CA 94109. My email address is
ricky@gobolaw.com.

5 On the date stated below, I served the foregoing documents described as

6 **PLAINTIFF'S SECOND AMENDED RESPONSES TO DEFENDANT**
7 **BLACKBERRY CORPORATION'S INTERROGATORIES, SET ONE**

8 ☒ **BY ELECTRONIC MAIL:** The document(s) listed was transmitted via email to the
9 email address(es) listed below.

10 Katherine M. Forster
11 Craig Jennings Lavoie
12 MUNGER TOLLES & OLSON LLP
13 350 S. Grand Ave., 50th Floor
14 Los Angeles, CA 90071
Email: Katherine.Forster@mto.com
Craig.Lavoie@mto.com

15 Attorneys for Defendants
16 BLACKBERRY CORPORATION

17 ☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this Court at
18 whose direction this service was made.

19 Executed on July 24, 2025, at Dublin, California.

20 
21 Ricky Phan